

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JAMES BROADNAX,

Plaintiff,

v.

LIZETTE FERNANDEZ, CHRISTY  
WALLER, SAMANTHA HORN, JONI  
SCHAEFFER, JAMAR BEY, PAUL  
REILLEY, SUZANNE FULTS, ALBERT  
PERKINS, BRYAN COLLIER, BOBBY  
LUMPKIN, LANNETTE LINTHICUM, and  
OWEN MURRAY in their individual  
capacities,

Defendants.

Case No. 4:24-cv-03132

**STIPULATION AND PROPOSED ORDER**

WHEREAS, by Order entered on October 30, 2024, the Court authorized Plaintiff James Broadnax to file his amended complaint no later than November 25, 2024, (ECF 30);

WHEREAS, Plaintiff filed his amended complaint on November 25, 2024, (ECF 35);

WHEREAS, Defendant Owen Murray filed a motion to dismiss on December 16, 2024, (ECF 48);

WHEREAS, Defendants Bryan Collier, Bobby Lumpkin, and Lannette Linthicum filed a motion to dismiss on December 20, 2024, (ECF 56);

WHEREAS, Plaintiff and Defendants Murray, Collier, Lumpkin, and Linthicum have agreed, subject to the approval of the Court, to extend the following deadlines:

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for Plaintiff and the attorneys for Defendants Murray, Collier, Lumpkin, and Linthicum as follows:

1. Plaintiff shall consolidate his opposition to Defendant Murray's motion to dismiss with that of Defendants Collier, Lumpkin, and Linthicum.

2. Plaintiff shall file a consolidated opposition to Defendants Murray, Collier, Lumpkin, and Linthicum's motions to dismiss no later than January 21, 2025.

Dated: December 20, 2024

By /s/ Steven C. Herzog  
Steven C. Herzog  
Pietro J. Signoracci  
Kennedy Ellen Barber-Fraser  
Julia Victoria Logue

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**JAMES LLOYD**

Deputy Attorney General for Civil Litigation

**SHANNA E. MOLINARE**

Division Chief

Law Enforcement Defense Division

By /s/ Alyssa Cervantes  
Alyssa Cervantes  
Assistant Attorney General

*Counsel for Defendants Bryan Collier, Bobby  
Lumpkin, and Lannette Linthicum*

By /s/ Alyson Chensasky  
Alyson Chensasky  
Assistant Attorney General

*Counsel for Defendant Owen Murray*

SO ORDERED:

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Dated

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Hon. Lee H. Rosenthal  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2024, I electronically filed the foregoing document with the Clerk for the United States District Court, Southern District of Texas. The electronic case filing system (CM/ECF) will send a Notice of Electronic Filing (NEF) to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By: /s/ Steven C. Herzog

Steven C. Herzog, Esq.